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10 Attorneys for Plaintiff
Twitch Interactive, Inc.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 TWITCH INTERACTIVE, INC., a
Delaware corporation,

17 Plaintiff,

18 v.

19 JOHN AND JANE DOES 1–100,
20 individuals,

21 Defendant.
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24
25
26
27
28

Case No. 19-cv-03418-WHO

**DECLARATION OF HOLLY M.
SIMPKINS IN SUPPORT OF PLAINTIFF
TWITCH INTERACTIVE, INC.'S EX
PARTE APPLICATION FOR LEAVE TO
SERVE THIRD PARTY SUBPOENAS
PRIOR TO A RULE 26(f) CONFERENCE**

[Civil L.R. 7-10]

1 I, Holly M. Simpkins, declare as follows:

2 1. I am an attorney licensed to practice law before the courts of the State of
3 Washington and am admitted *pro hac vice* in this matter. I am a Partner at Perkins Coie LLP, and
4 counsel in this action for Plaintiff Twitch Interactive, Inc. (“Twitch”). I submit this declaration in
5 support of Twitch’s Ex Parte Application for Leave to Serve Third Party Subpoenas Prior to a
6 Rule 26(f) Conference. I have personal knowledge of the facts stated herein and, if called upon,
7 could and would testify competently thereto under oath.

8 2. At my direction, the websites, chat servers, and social media platforms Defendants
9 used to coordinate their attack on Twitch were investigated.

10 3. Attached hereto as Exhibit A is a screenshot of the website,
11 www.artifactstreams.com, and screenshots from Discord server numbers 585980929831600138,
12 583216242131730432, and 588140586956226565 (called at times PEEPO PLANET, GO
13 AGANE, and TWITCH LEGION, INC.) that Defendants used to discuss and plan their attack.
14 The website located at www.artifactstreams.com had links to the Discord servers and a Twitter
15 account, <http://twitter.com/TwitchToS>.

16 4. As of the date of the filing of this motion, Defendants appear to have stopped
17 using www.artifactstreams.com and have made the @TwitchToS Twitter account private.

18 5. A WhoIs search on the website www.artifactstreams.com revealed what appears to
19 be falsified contact information, including the name and address associated with the domain.
20 Attached hereto as Exhibit B is a copy of the information returned from the WhoIs search.

21 6. Attached hereto as Exhibit C is a screenshot captured at my direction showing that
22 an individual using the Discord username “Skel” moderated the Discord group
23 585980929831600138 (otherwise known as PEEPO PLANET).

24 7. Attached hereto as Exhibit D is a screenshot of the @Twitch ToS Twitter account
25 captured at my direction on June 11, 2019.

26 8. At my direction, IP addresses associated with Twitch accounts banned multiple
27 times during the May 2019 attack were searched using a reverse WhoIs lookup tool. That search
28 provided ISP and geolocation information for each IP address. IP addresses from that group that

are geolocated to the United States are associated with the following ISPs: Verizon, Comcast Cable Communications LLC, Contina, Charter Communications Inc., Optimum Online, and Suddenlink Communications.

IP Address	ISP
173.169.195.5	Charter Communications Inc
173.170.43.209	Charter Communications Inc
65.35.0.195	Charter Communications Inc
70.114.155.143	Charter Communications Inc
70.117.28.94	Charter Communications Inc
24.5.142.22	Comcast Cable Communications LLC
73.169.237.198	Comcast Cable Communications LLC
73.224.10.27	Comcast Cable Communications LLC
73.228.2.61	Comcast Cable Communications LLC
73.26.187.185	Comcast Cable Communications LLC
73.26.237.67	Comcast Cable Communications LLC
73.65.112.131	Comcast Cable Communications LLC
73.8.232.156	Comcast Cable Communications LLC
98.195.21.158	Comcast Cable Communications LLC
104.128.136.114	Contina
104.128.136.115	Contina
108.51.234.121	MCI Communications Services Inc. d/b/a Verizon Business
71.125.69.18	MCI Communications Services Inc. d/b/a Verizon Business
71.125.92.153	MCI Communications Services Inc. d/b/a Verizon Business

IP Address	ISP
71.187.4.167	MCI Communications Services Inc. d/b/a Verizon Business
71.187.4.45	MCI Communications Services Inc. d/b/a Verizon Business
173.216.156.254	Suddenlink Communications
69.113.226.244	Optimum Online

9. Twitch identified several IP addresses associated with the May 2019 attack that were associated with a Canadian cloud computing and remote server company named OVH Hosting, Inc., including the following:

IP Address	ISP
54.39.209.36	OVH SAS
54.39.209.41	OVH SAS
54.39.209.42	OVH SAS
54.39.209.44	OVH SAS
54.39.209.46	OVH SAS
54.39.24.32	OVH SAS
54.39.24.35	OVH SAS
54.39.24.40	OVH SAS
54.39.24.42	OVH SAS
66.70.167.115	OVH SAS
66.70.167.116	OVH SAS
66.70.167.123	OVH SAS

10. Attached hereto as Exhibit E is a screenshot of the OVH Hosting, Inc. website showing that it has server locations in the United States.

1 11. At my direction, a cease and desist letter, copy of the Complaint, and a waiver of
2 service form, among other documents, were sent to the following email addresses:
3 ganggangchef@gmail.com, skelthade@gmail.com and jfernandes423@hotmail.com on June 17,
4 2019. Those emails and attachments are attached hereto as Exhibits F, G, and H.

5 12. Attached hereto as Exhibit I is a copy of the Twitch Terms of Service, which was
6 captured at my direction on June 19, 2019.

7 13. Attached hereto as Exhibits J–M are representative samples of the substantive
8 components of subpoenas Twitch seeks to serve to Defendants’ social media providers, ISPs, and
9 email providers.

10
11 I declare under penalty of perjury under the laws of the United States that the foregoing is true
12 and correct.

13
14 Executed at Seattle, Washington this 27th day of June, 2019.

15
16
17 /s/ Holly M. Simpkins
Holly M. Simpkins